

UNITED STATES DISTRICT COURT

for the

WESTERN District of WISCONSIN

Division

Case No. 22CV257

(to be filled in by the Clerk's Office)

HERU SPENCER

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

TIFFANY WAIT

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	TIFFANY WAIT
Street Address	3030 NORTHWEST EXPRESSWAY SUITE 200,#126
City and County	OKLAHOMA CITY
State and Zip Code	OK, 73112
Telephone Number	4098773314
E-mail Address	TIFFANY@PRISMATICLIGHTCHURCH.ORG

PLAINTIFF'S APPLICATION FOR TEMPORARY RESTRAINING ORDER WITH
EQUITABLE RELIEF AND ORDER TO SHOW CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT ISSUE

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure, Plaintiff Heru Spencer, hereby applies to this Court for a temporary restraining order ("TRO") with other equitable relief. In support of the motion, Plaintiff states as follows:

1. Pursuant to 15 U.S. Code § 1114 1. (a), (b) the defendants did knowingly and maliciously engage in violation of trademark & intellectual property infringement. On 04/18/2022 online and through commerce on multiple social media sites, website, & continues to violate Plaintiffs intellectual property. Posing as Plaintiffs company DBA name & religious organization “the church of prismatic light”. The defendants continues to pose as our religious organization.
2. Pursuant to The U.S. Copyright Act, (codified at [17 U.S.C. §§ 101 - 810](#)) section [§ 102](#) the defendants used the plaintiffs pending copyright intellectual property on the defendants social media & website.
3. On 04/04/2022 the defendant engaged in fraudulently fund raising using our DBA & pending trademark name “The Church Of Prismatic Light” to fund raise on tiktok, facebook, twitter, www.prismaticlightchurch.org, youtube, reddit & instagram.

Plaintiff Therefore seeks a TRO:

- A. The plaintiff is seeking injunctive relief & for the defendants to cease posing online or in public, commerce & representative of our religion & our intellectual mark/name” the church of prismatic light”, as it is disrupting our business, creating confusion among the public of who is the legal “ the church of prismatic light”, further by posing with our name the defendant is collecting funds and church members that are rightfully ours. Until the court decides on the matter & our trademark & copywrite is approved in 1 year.
- B. To cease engagement with the media News and other media outlets, & any public interface by posing as our company /religion & falsely claiming credit for the Mark “the church of prismatic light”& intellectual property & ideas afforded them in a zoom call February – March 2021 & using our intellectual property which they became privy to in 2021, the defendant is ruining our reputation as a non profit & religious organization.
- C. We ask for a provision from the court that neither party defendant or plaintiff may slander or defame the other party publicly as a means of retaliation to this complaint.
- D. Restraining and enjoining Defendants and certain third parties from destroying or concealing documents;
- E. Authorizing expedited discovery from Defendants and third parties, for the purpose of discovering infomation about Defendants' identities, assets, and/or business activities;

- F. Requiring Defendants to show cause why this Court should not issue a preliminary injunction extending such temporary relief pending an adjudication on the merits;
and
- G. Providing for other equitable relief

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/11/22

Signature of Plaintiff

Printed Name of Plaintiff Heru Spencer

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____